

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

| | |
|---|-------------------------------------|
| IN RE: <u>Jennifer L. Shinn Madden</u> | Case No. 24-10354-amc Chapter 13 |
| Santander Bank, N.A., Movant | |
| vs. Jennifer L. Shinn Madden , Debtor | |

**WITHDRAWAL OF FILED AS NOTICE OF POSTPETITION MORTGAGE FEES,
EXPENSES, AND CHARGES (DOCUMENT FILED: MOTION FOR RELIEF)**

Santander Bank, N.A. (“Movant”), by and through its legal counsel, hereby withdraws its FILED AS NOTICE OF POSTPETITION MORTGAGE FEES, EXPENSES, AND CHARGES (DOCUMENT FILED: MOTION FOR RELIEF) filed on August 28, 2024, via Claims Register, Claim Number 4.

This 23rd day of September, 2024.

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Withdrawal of Filed as Notice of Postpetition Mortgage Fees, Expenses, and Charges (Document filed: Motion for Relief) has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Michael A. Cibik, Debtor's Attorney
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
help@cibiklaw.com

Scott F. Waterman [Chapter 13], Bankruptcy Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Office of United States Trustee, US Trustee
Robert N.C. Nix Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

Via First Class Mail:

Jennifer L. Shinn Madden
7146 Cottage St
Philadelphia, PA 19135

Date: September 23, 2024

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
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